

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No. CV-24-04546-SB (AGRx) Date: March 12, 2025

Title Shakey's Pizza Asia Ventures, Inc. v. PCJV USA, LLC, et al.

Present: The Honorable: Alicia G. Rosenberg, United States Magistrate Judge

L. Krivitsky for K. Lozada
Deputy Clerk

CS 03/12/2025
Court Reporter / Recorder

Attorneys Present for Plaintiff:
Michael Donnelly Murphy
Jordan Zollicoffer

Attorneys Present for Defendants:
Arash Beral
Todd Matthew Malynn

Proceedings: VIDEO DISCOVERY CONFERENCE

Case is called. Counsel state their appearances. The court and counsel conferred as stated on the record regarding the joint agenda filed on March 11, 2025 and Fed. R. Civ. P. 26(b)(1). (Dkt. No. 123.)

The court determined that the discovery dispute regarding PCJV USA, LLC's ("PCJV") Document Request No. 23 is not ripe for adjudication.

Plaintiff agreed to produce documents responsive to PCJV's Document Request No. 25.

For the reasons stated on the record, IT IS ORDERED that:

1. Counsel shall promptly file a stipulation and proposed protective order by March 14, 2025.
2. On or before March 21, 2025, Plaintiff shall serve a supplemental response to Interrogatory No. 1, which is limited to the trade secrets Plaintiff contends were misappropriated by Defendants.
3. Plaintiff shall commence its document production responsive to Defendant PCJV USA, LLC's Requests for Production of Documents ("RFP"), Set One,

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during the week of March 24, 2025 with an estimated date of completion by April 11, 2025. The court rules as follows on the individual RFPs:

- a. In response to RFP Nos. 1-20, Plaintiff may exclude documents, or redact portions of documents, that apply solely to countries other than the United States.
- b. In addition to the limitation in Paragraph 1 above, Plaintiff may select the custodians whose electronic files will be searched in response to RFP Nos. 10, 11, 17, and 18. This order is without prejudice to Defendants' ability to request additional custodians as appropriate.
- c. RFP No. 14 is limited to press releases and company statements made in compliance with SEC requirements regarding the acquisition of Potato Corner assets, in addition to the limitation in Paragraph 3.a. above.
- d. RFP No. 21 is limited to communications between Plaintiff and the Franchisees in the first instance. Plaintiff shall serve a privilege log of responsive communications that Plaintiff withholds from production, if any.
- e. In response to RFP No. 22:
 - i. Plaintiff shall produce confidentiality and "reverse engineering" agreements regarding recipes with suppliers; franchisees in the United States; and subfranchisees in the United States. Plaintiff shall also produce a sample confidentiality and "reverse engineering" agreement for each country outside the United States.
 - ii. Counsel shall confer regarding custodians and search terms for other types of responsive documents (e.g., enforcement documents).

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- f. RFP No. 24 is limited to confidential, proprietary information that Plaintiff contends was misappropriated by Defendants. Plaintiff shall produce documents within its possession, custody or control within the meaning of Rule 34.
 - g. RFP Nos. 26 and 27 are limited to the trade secrets that Plaintiff contends were misappropriated by Defendants. To the extent a responsive item is a tangible thing, Plaintiff shall produce a sample of the item and its contents.
- 4. A status conference is scheduled for Friday, April 4, 2025 at 10:00 a.m. by Zoom.
- 5. A Joint Agenda that lists the discovery disputes to be addressed at the April 4, 2025 status conference shall be filed on or before 1:00 p.m. on Thursday, April 3, 2025.

cc: District Judge Stanley Blumenfeld, Jr.

Initials of Preparer

2:25

LK